

189409

SOUTHERN ENVIRONMENTAL LAW CENTER

200 WEST FRANKLIN STREET, SUITE 330
CHAPEL HILL, NC 27516-2559

Telephone 919-967-1450
Facsimile 919-929-9421
selcnc@selcnc.org

Charlottesville, VA
Chapel Hill, NC
Atlanta, GA
Asheville, NC
Sewanee, TN

November 8, 2007

Mr. Charles L.A. Terreni
Chief Clerk of the Commission
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

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2007 NOV - 9 AM 10:14
SC PUBLIC SERVICE
COMMISSION

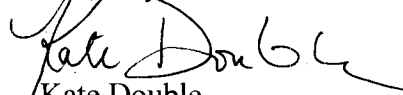
RE: Application of Duke Energy Carolinas, LLC for Approval of Energy
Efficiency Plan Including and Energy Efficiency Rider and Portfolio of
Energy Efficiency Programs
DOCKET NO.: 2007-358-E

Dear Mr. Terreni:

Enclosed please find for filing an original and (10) copies of the Petitions to Intervene of the Southern Environmental Law Center ("SELC"), the Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE") in that above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve us with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

I have enclosed an extra copy of these petitions which I would ask you to date stamp and return to me in the stamped self-addressed envelope enclosed for your convenience. If you have questions, please do not hesitate to contact us.

Sincerely,



Kate Double
Administrative Legal Assistant

#2 2-508 10:30
DATE: 11/8/07
K. Double

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of:

Application of Duke Energy Carolinas,
LLC for Approval of Energy Efficiency
Plan Including an Energy Efficiency Rider
and Portfolio of Energy Efficiency Programs

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 358 - E

"SELC"

(Please type or print)

Submitted by: J. Blanding Holman, IV

SC Bar Number: 72260

Address: Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516

Telephone: (919)967-1450

Fax: (919)929-9421

Other:

Email: BHolman@SELCNC.org

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificati
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigati
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

OK D. Duke
OK D. Duke

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2007-358-E

In the Matter of:)

Application of Duke Energy Carolinas,)
LLC for Approval of Energy Efficiency)
Plan Including an Energy Efficiency Rider)
and Portfolio of Energy Efficiency Programs))
)

SOUTHERN ENVIRONMENTAL
LAW CENTER'S
PETITION TO INTERVENE

RECEIVED
2007 NOV - 9 AM 10:14
SC PUBLIC SERVICE COMMISSION
JCE

The Southern Environmental Law Center ("SELC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules, to intervene in this docket. In support of its petition, SELC states as follows:

1. The Southern Environmental Law Center ("SELC") is a non-profit regional environmental organization dedicated to the protection of natural resources in South Carolina and throughout the Southeast. SELC works to protect the health of North Carolina residents, including the organization's members in the state, by advocating for renewable energy and energy conservation and efficiency policies and for emissions reductions at electric utility plants in North Carolina. The address of SELC's Carolinas Office is: Southern Environmental Law Center, 200 W. Franklin St., Suite 330, Chapel Hill, NC 27516.

2. Many of SELC's members are customers of Duke Energy Carolinas. SELC and its members are interested in promoting greater reliance on energy conservation and efficiency to meet South Carolina's energy needs.

3. SELC and its members have a direct and material interest in the issues before the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

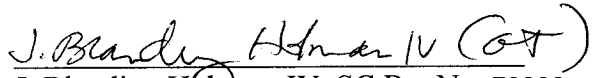
4. Given the state of the record at this early stage of the proceeding, SELC lacks sufficient information to develop and state its position at this time.

5. SELC is represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Marily Nixon
Gudrun Thompson
Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

WHEREFORE, SELC prays that it be allowed to intervene in this matter.

Respectfully submitted this 8th day of November, 2007.


J. Blanding Holman, IV, SC Bar No. 72260
Marily Nixon, NC Bar No. 33724
Gudrun Thompson, NC Bar No. 28829

Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the Southern Environmental Law Center's Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid:

Catherine E. Heigel , Assistant General
Counsel
Duke Energy Carolinas, LLC
Post Office Box 1006, EC03T
Charlotte, NC, 28201-1066
Email: ceheigel@duke-energy.com

Scott Elliott , Counsel
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC, 29205
Email: selliott@elliottlaw.us

Nanette S. Edwards , Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC, 29211
Email: nsedwar@regstaff.sc.gov

Bonnie D. Shealy , Counsel
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC, 29202
Email: bshealy@robinsonlaw.com

Frank R. Ellerbe III , Counselor
Robinson, McFadden & Moore, P.C.
P.O. Box 944
Columbia, SC, 29202
Email: fellerbe@robinsonlaw.com

This 2nd day of November, 2007.

J. Blanding Holman (GT)
J. Blanding Holman, IV
Attorney for the Southern
Environmental Law Center

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2007 NOV -9 AM 10:14
SC PUBLIC SERVICE
COMMISSION

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of:

Application of Duke Energy Carolinas,
LLC for Approval of Energy Efficiency
Plan Including an Energy Efficiency Rider
and Portfolio of Energy Efficiency Programs

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 358 - E

"CCL"

(Please type or print)

Submitted by: J. Blanding Holman, IVSC Bar Number: 72260

Address: Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516

Telephone: (919)967-1450Fax: (919)929-9421

Other: _____

Email: BHolman@SELCNC.org

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- | | | | |
|--|--|--|---|
| <input checked="" type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certificati |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigatic |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input checked="" type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2007-358-E

RECEIVED
2007 NOV - 9 11:10:13
SC PUBLIC SERVICE
COMMISSION

In the Matter of:

Application of Duke Energy Carolinas,
LLC for Approval of Energy Efficiency
Plan Including an Energy Efficiency Rider
and Portfolio of Energy Efficiency Programs)

SOUTH CAROLINA COASTAL
CONSERVATION LEAGUE'S
PETITION TO INTERVENE

The South Carolina Coastal Conservation League ("CCL") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules, to intervene in this docket. In support of its petition, CCL states as follows:

1. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, SC 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians.

2. CCL has members in South Carolina in who receive electricity service from Duke Energy Carolinas, LLC ("Duke") who would be subject to direct impacts of Duke's energy efficiency plan, its associated energy efficiency rider, and its portfolio of energy efficiency program.

3. CCL and its members have a direct and material interest in the issues before the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

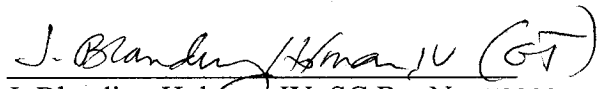
4. Given the state of the record at this early stage of the proceeding, CCL lacks sufficient information to develop and state its position at this time.

5. CCL is represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Marily Nixon
Gudrun Thompson
Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

WHEREFORE, CCL prays that it be allowed to intervene in this matter.

Respectfully submitted this 8th day of November, 2007.


J. Blanding Holman, IV, SC Bar No. 72260
Marily Nixon, NC Bar No. 33724
Gudrun Thompson, NC Bar No. 28829

Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

Attorneys for CCL

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the South Carolina Coastal Conservation League's Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid:

Catherine E. Heigel , Assistant General
Counsel
Duke Energy Carolinas, LLC
Post Office Box 1006, EC03T
Charlotte, NC, 28201-1066
Email: ceheigel@duke-energy.com

Scott Elliott , Counsel
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC, 29205
Email: selliott@elliottlaw.us

Nanette S. Edwards , Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC, 29211
Email: nsedwar@regstaff.sc.gov

Bonnie D. Shealy , Counsel
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC, 29202
Email: bshealy@robinsonlaw.com

Frank R. Ellerbe III , Counselor
Robinson, McFadden & Moore, P.C.
P.O. Box 944
Columbia, SC, 29202
Email: fellerbe@robinsonlaw.com

This 8th day of November, 2007.

J. Blanding Holman, IV (AT)
J. Blanding Holman, IV
Attorney for South Carolina
Coastal Conservation League

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COMMISSION

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of:

Application of Duke Energy Carolinas,
 LLC for Approval of Energy Efficiency
 Plan Including an Energy Efficiency Rider
 and Portfolio of Energy Efficiency Programs

BEFORE THE
 PUBLIC SERVICE COMMISSION
 OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2007 - 358 - E

"SACE"

(Please type or print)

Submitted by: J. Blanding Holman, IVSC Bar Number: 72260

Address: Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516

Telephone: (919)967-1450Fax: (919)929-9421

Other: _____

Email: BHolman@SELCNC.org

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☐ Other: _____

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<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2007-358-E

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SC PUBLIC SERVICE
COMMISSION

In the Matter of:

Application of Duke Energy Carolinas,
LLC for Approval of Energy Efficiency
Plan Including an Energy Efficiency Rider
and Portfolio of Energy Efficiency Programs)

SOUTHERN ALLIANCE FOR
CLEAN ENERGY'S
PETITION TO INTERVENE

Southern Alliance for Clean Energy ("SACE") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules, to intervene in this docket. In support of its petition, SACE states as follows:

1. SACE is a nonprofit corporation organized under the laws of the State of Tennessee. The principal address of SACE is P.O. Box 1842, Knoxville, TN 37901-1842. The North Carolina Office of SACE is located at 29 North Market Street, Suite 409, Asheville, NC 28801. One purpose of SACE is to advocate for energy plans, policies and systems that best serve the environmental, public health and economic interest of the communities in the Southeast.

2. Many of SACE's members are customers of Duke Energy Carolinas. SACE and its members are interested in promoting greater reliance on energy conservation and efficiency to meet South Carolina's energy needs.

3. SACE and its members have a direct and material interest in the issues before the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

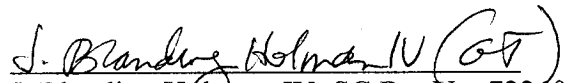
4. Given the state of the record at this early stage of the proceeding, SACE lacks sufficient information to develop and state its position at this time.

5. SACE is represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Marily Nixon
Gudrun Thompson
Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

WHEREFORE, SACE prays that it be allowed to intervene in this matter.

Respectfully submitted this 8th day of November, 2007.


J. Blanding Holman, IV, SC Bar No. 72260
Marily Nixon, NC Bar No. 33724
Gudrun Thompson, NC Bar No. 28829

Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

Attorneys for SACE

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with Southern Alliance for Clean Energy's Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid:

Catherine E. Heigel , Assistant General
Counsel
Duke Energy Carolinas, LLC
Post Office Box 1006, EC03T
Charlotte, NC, 28201-1066
Email: ceheigel@duke-energy.com

Scott Elliott , Counsel
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC, 29205
Email: selliot@elliottlaw.us

Nanette S. Edwards , Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC, 29211
Email: nsedwar@regstaff.sc.gov

Bonnie D. Shealy , Counsel
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC, 29202
Email: bshealy@robinsonlaw.com

Frank R. Ellerbe III , Counselor
Robinson, McFadden & Moore, P.C.
P.O. Box 944
Columbia, SC, 29202
Email: fellerbe@robinsonlaw.com

This 8th day of November, 2007.

J. Blanding Holman, IV (GT)
J. Blanding Holman, IV
Attorney for Southern Alliance
for Clean Energy

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COMMISSION